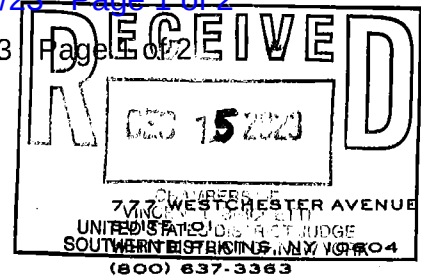


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12/15/23

December 15, 2023

ECF

The Honorable Vincent L. Briccetti
 United States District Judge
 Southern District of New York
 300 Quarropas Street
 White Plains, NY 10601

RE: United States v. Felix Nunez Paula
 Case No.: 7:23CR602 (VB)

By 12/18/2024, the government
 submit a letter explaining the
 basis of its objection to the
 instant request.

SO ORDERED:

Vincent Briccetti
 12/15/2023

Dear Judge Briccetti:

The undersigned has been appointed to represent Mr. Felix Nunez Paula in the above-captioned matter. The defendant respectfully moves, pursuant to 18 U.S.C. § 3145(a)(2), to amend the conditions of his release. Mr. Nunez Paula seeks an Order of the Court permitting him to travel to the Dominican Republic with the advanced notification and approval of his United States Pretrial Services Officer, to visit his family for the holidays from December 24, 2023, to January 15, 2024.

In order to facilitate the defendant's request, the defendant will do the following:

1. Mr. Nunez Paula will leave on December 24, 2023, to travel to the Dominican Republic by plane;
2. Prior to having permission to travel outside the Southern District of New York, Mr. Nunez Paula will identify the mode of transportation to and from the destinations listed (if a motor vehicle, a picture of a license plate as well as the make, model and color of the vehicle as well as who will be driving; if a plane, a picture of the tickets to and from as well as the times and departure and arrival locations);
3. Upon arriving back in the Southern District of New York, Mr. Nunez Paula will telephone his probation officer and indicate that he has returned.

LAW OFFICES OF
KOFFSKY & FELSEN, LLC

December 15, 2023

The undersigned has spoken to United States Pretrial Services Officer Jessica Aguliar, who indicated that Mr. Nunez Paula has been fully compliant with his conditions of release, and she has no objection to the requested modification.

The undersigned has spoken to AUSA Ben Arad, who has indicated that the government objects to the requested permission to travel out of the country and modification of release.

WHEREFORE, the defendant moves that the Court issue an Order of the Court permitting the defendant to travel with the advanced notification and approval of his United States Pretrial Services Officer, to visit his family in the Dominican Republic on the dates listed above, subject to the conditions imposed by his probation officer.

Respectfully submitted,

/s/ Bruce D. Koffsky

BDK/th

cc: All Counsel of Record via ECF
U.S.P.S.O. Jessica Aguilar